

In the Figures

Amendments to the Figures are attached hereto in Appendix C ("Amendments to the Figures"). Figure 1 has been amended to include the heel securing members 17.

Arguments

The Examiner's Objections and Rejections

Applicant has noted the Office Action's objections, rejections, and bases for same. For the following reasons, Applicant respectfully submits that the new and amended claims are in a condition for allowance. Applicant respectfully requests that the Examiner consider the arguments and remarks as set forth below and pass the application to issuance.

Specification – Objection(s)

The Office Action has objected to the specification for failing to follow recommended guidelines of preferred layout and content, e.g., not including a summary section, background, and sequence listing. Per a telephone conversation with Examiner Gerald Klebe on 21 October 2004, the examiner has retracted this objection.

Informalities Objected-to

Page 1, line 9 and page 2 line 8 have been objected to for informalities. Applicant has made appropriate corrections.

Drawings

The drawings have been objected to as not showing each and every feature of the invention as claimed. The claims and the drawings have been amended, as provided supra, such that the amended application overcomes this objection.

Claim Objections

The Office Action has also objected to claims 2, 4, 11, 16, 18-19, 24, 29, 31-32, 37, and 42 for informality. Applicant has amended the claims to correct these informalities and believes that the amendments, as provided supra, overcome this rejection.

35 U.S.C. §112

The Office Action has rejected claims 6-7, 14-15, 27-28, 34, and 40-41 under 35 U.S.C. §112, paragraph 2, as being indefinite for failing to particularly point out and distinctly claim the subject matter regarded as the invention. Applicant has amended the claims and believes that the amendments, as provided supra, overcome this rejection.

35 U.S.C. §102

The Office Action has also rejected claims 1-3, 7, 10-12, and 14-15 under 35 U.S.C. §102 as being anticipated by U.S. patent number 6,196,558 (Simon '558). Applicant has amended the claims and believes that the amendments, as provided supra, overcome this rejection.

35 U.S.C. §103(a)

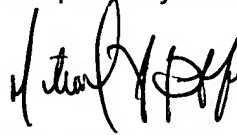
The Office Action has also rejected claims 4-6, 8-9, 13, 17-26, 27-28, 30-39, and 40-41 under 35 U.S.C. §103(a) as being unpatentable over Simon '558 in view of the skill of one of ordinary skill in the art. Applicant has amended the claims and believes that the amendments, as provided supra, overcome this rejection.

Remarks

In view of the foregoing discussion, it is respectfully submitted that the new claims are in condition for allowance, and such allowance is earnestly solicited. Applicant also confirms that no new matter has been added to the application.

Date: October 28, 2004

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael A. Baffa".

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